

ERIC GRANT
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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

DARRELL DANIEL,

Defendant.

CASE NO. 2:24-cr-00261-JAM

**FIFTH STIPULATION AND ORDER TO
CONTINUE STATUS CONFERENCE AND
EXCLUDE TIME**

DATE: August 26, 2025

TIME: 9:00 a.m.

COURT: Hon. John A. Mendez

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and
defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By prior order, this matter is currently set for a status conference on August
26, 2025.

2. By this stipulation, defendant now moves to continue the status conference
until **October 21, 2025, at 09:00 a.m.**, and to exclude time between August 26, 2025, and
October 21, 2025, under Local Code T4.

3. The parties agree and stipulate, and request that the Court find the
following:

a) The government has represented that the discovery associated with
this case includes law enforcement reports, photographs, audio recordings, and

1 search warrants related to a years-long investigation of criminal conduct that
2 spanned five years. All of this discovery has been either produced directly to
3 counsel and/or made available for inspection and copying.

4 b) The parties had anticipated being prepared to present a plan to resolve
5 the case to the Court by the August 26, 2025 status hearing. The party are not,
6 however, prepared at this time because there has been a change in counsel for the
7 defendant. New counsel needs additional time to meet with the defendant to
8 discuss the proposed plea offer. Accordingly, the parties are requesting an
9 additional continuance before setting the matter for a change of plea or jury trial.

10 c) Leading up to October 21, 2025, counsel for defendant desires
11 additional time review the discovery, conduct defense investigation, consult with
12 her client, discuss potential resolution of the matter, and otherwise prepare for
13 trial.

14 d) Counsel for defendant believes that failure to grant the above-
15 requested continuance would deny her the reasonable time necessary for effective
16 preparation, taking into account the exercise of due diligence.

17 e) The government does not object to the continuance.

18 f) Based on the above-stated findings, the ends of justice served by
19 continuing the case as requested outweigh the interest of the public and the
20 defendant in a trial within the original date prescribed by the Speedy Trial Act.

21 g) For the purpose of computing time under the Speedy Trial Act, 18
22 U.S.C. § 3161, et seq., within which trial must commence, the time period of August
23 26, 2025 to October 21, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. §
24 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted
25 by the Court at defendant's request on the basis of the Court's finding that the ends
26 of justice served by taking such action outweigh the best interest of the public and
27 the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: August 19, 2025

ERIC GRANT
United States Attorney

/s/ JUSTIN L. LEE
JUSTIN L. LEE
Assistant United States Attorney

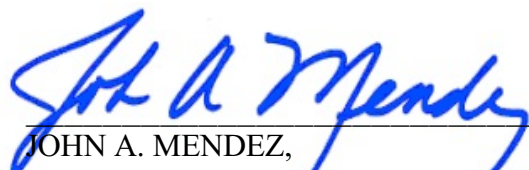
Dated: August 19, 2025

/s/ NOA OREN
NOA OREN
Counsel for Defendant
DARRELL DANIEL

ORDER

IT IS SO ORDERED.

August 19, 2025



JOHN A. MENDEZ,
SENIOR UNITED STATES DISTRICT JUDGE